

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

PEARSON EDUCATION, INC.; BEDFORD,
FREEMAN & WORTH PUBLISHING
GROUP, LLC D/B/A MACMILLAN
LEARNING; MACMILLAN HOLDINGS,
LLC; CENGAGE LEARNING, INC.;
ELSEVIER INC.; ELSEVIER B.V.;
MCGRAW HILL LLC; AMERICAN
ACADEMY OF PEDIATRICS; AMERICAN
HEART ASSOCIATION, INC.; AMERICAN
PSYCHIATRIC ASSOCIATION;
AMERICAN PSYCHOLOGICAL
ASSOCIATION, INC.; GUILFORD
PUBLICATIONS, INC.; HARPERCOLLINS
PUBLISHERS LLC; THE ZONDERVAN
CORPORATION LLC; JOHN WILEY AND
SONS, INC.; JONES & BARTLETT
LEARNING, LLC; NO STARCH PRESS,
INC.; PENGUIN RANDOM HOUSE LLC;
PENGUIN BOOKS LIMITED COMPANY;
SOURCEBOOKS, LLC; SIMON &
SCHUSTER, INC.; SPRINGER
PUBLISHING COMPANY, LLC; TAYLOR
& FRANCIS GROUP LLC;
W.W. NORTON & COMPANY, INC.;
LIVERIGHT PUBLISHING
CORPORATION; and
WOLTERS KLUWER HEALTH, INC.,

Plaintiffs,

v.

KHALED HASAN; NASIMA AKHTER;
ANK EXIM LLC; AURUM AMB LLC; IIZ
FORWARDING LLC; WESTPVT LTD LLC;
PRITAM SINGH; POOJA BISHT; ANKUSH
SHARMA; ANSHOO SHARMA;
PRAVEEN KUMAR SHARMA; ANINDITA
MAHANTA; MOHD KASHIF RASHID;
SAMAN NAAZ; ZYRUS ERETAIL
PRIVATE LIMITED; TWIQ EXPORT PVT

Civil Action No. 23-cv-7284-PAC

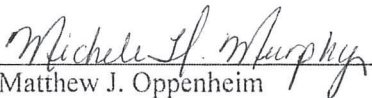
LTD; STOREMATE KART SERVICES PVT
LTD; LIFE OF RILEY PRIVATE LIMITED;
LIFE OF RILEY INTERNATIONAL INC.;
POOJA SHARMA; and DOES 1-50;

Defendants.

STIPULATION FOR ENTRY OF JUDGMENT AND PERMANENT INJUNCTION

In accordance with a Settlement Agreement, Plaintiffs and Doe Defendants d/b/a Ronnybooks ("Ronnybooks") hereby request that the Court enter the Proposed Final Judgment and Permanent Injunction, filed herewith.

STIPULATED AND AGREED TO BY:


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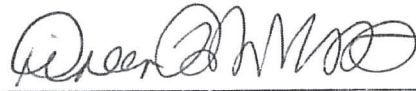
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Ronnybooks

Date: 1/30/2024

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Civil Action No. 23-cv-7284-PAC

LTD; LIFE OF RILEY PRIVATE LIMITED;
LIFE OF RILEY INTERNATIONAL INC.;
POOJA SHARMA; and DOES 1–50;

Defendants.

**[PROPOSED] FINAL JUDGMENT AND PERMANENT INJUNCTION
AS TO DOE DEFENDANTS d/b/a RONNYBOOKS**

On August 15, 2023 the Plaintiffs in this action filed a Complaint asserting claims for copyright and trademark infringement pursuant to, respectively, the Copyright Act, 17 U.S.C. §§ 101 *et seq.*, and the Lanham Act, 15 U.S.C. §§ 1114(1) *et seq.*, against multiple Defendants, and on October 23, 2023, the Plaintiffs in this action filed an Amended Complaint that added plaintiffs, named Defendants, and Doe Defendants. The Complaint and Amended Complaint identify Doe Defendants d/b/a Ronnybooks (i.e., the owners, operators, and/or controllers of the online storefront known as “Ronnybooks”) (“Ronnybooks”). The parties have informed the Court that the claims against Ronnybooks have been settled and filed a Stipulation requesting that the Court enter this Final Judgment and Permanent Injunction.

NOW, THEREFORE, it is hereby:

I. ORDERED that final judgment is **ENTERED** against Ronnybooks as to the transactions, copyrighted works, and trademarks appearing on such copyrighted works described in Exhibit 1 hereto (“Resolved Claims”). The parties shall bear their own costs and expenses, including attorneys’ fees, in connection with this final judgment. This final judgment resolves the Resolved Claims with prejudice. No other claims against Ronnybooks are resolved or adjudicated by this final judgment, nor are such other claims asserted in this case at this time. Accordingly, upon the entry of this final judgment, this action is terminated as to Ronnybooks.

II. FURTHER ORDERED that a permanent injunction is **ENTERED** in this action as follows:

- a. Ronnybooks, its officers, agents, employees, and attorneys, and all those in active concert or participation with any of them, who receive actual notice of this Permanent Injunction, are permanently enjoined from the following acts, whether undertaken in connection with the “Ronnybooks” online storefront or otherwise:
 - i. Directly or indirectly infringing any of the Publishers’ Copyrighted Works¹;
 - ii. Directly or indirectly infringing any of the Trademark Plaintiffs’ Marks²;

¹ “Publishers’ Copyrighted Works” means any and all textbooks, test banks, solutions manuals, or other copyrighted works, or portions thereof, whether now in existence or later created, regardless of media type, the copyrights to which are owned or exclusively controlled by Pearson, Bedford, Freeman & Worth Publishing Group, LLC d/b/a Macmillan Learning (“Macmillan Learning”), Cengage, Elsevier, McGraw Hill, American Academy of Pediatrics, American Heart Association, Inc., American Psychiatric, American Psychological Association, Inc., Guilford Press, HarperCollins Publishers LLC, The Zondervan Corporation LLC, Wiley, Jones & Bartlett Learning, LLC, No Starch Press, Inc., Penguin Random House LLC, Sourcebooks, LLC, Simon & Schuster, Inc., Springer, Taylor & Francis, W.W. Norton, Liveright Publishing Corporation, and Wolters Kluwer or their parents, subsidiaries, affiliates (excluding for Macmillan Learning, its affiliates and its parents other than its immediate parent company, Macmillan Holdings), predecessors, successors, and assigns, whether published in the United States or abroad.

² “Trademark Plaintiffs” means Cengage, Elsevier, Elsevier B.V., Macmillan Holdings, LLC, McGraw Hill, Pearson, American Academy of Pediatrics, American Heart Association, Inc., American Psychiatric, American Psychological Association, Inc., Guilford Press, HarperCollins Publishers LLC, The Zondervan Corporation LLC, Wiley, Jones & Bartlett Learning, LLC, No Starch Press, Inc., Penguin Random House LLC, Penguin Books Limited Company, Sourcebooks, LLC, Simon & Schuster, Inc., Springer Publishing Company, Taylor & Francis, W.W. Norton, and Wolters Kluwer. “Trademark Plaintiffs’ Marks” means any and all trademarks, whether now in existence or later created, owned by the Trademark Plaintiffs or their parents, subsidiaries,

- iii. Copying, reproducing, manufacturing, importing, downloading, uploading, transmitting, distributing, selling, offering for sale, advertising, marketing, promoting, or otherwise exploiting any of the Publishers' Copyrighted Works and/or goods bearing infringing copies of the Trademark Plaintiffs' Marks or;
- iv. Enabling, facilitating, permitting, assisting, soliciting, encouraging, or inducing others to engage in the acts described in paragraphs II.a.i-iii above.

III. FURTHER ORDERED that the Court retains jurisdiction for the purpose of enforcing this Order.

IV. FURTHER ORDERED that this Order replaces the Court's Preliminary Injunction issued in this case as to Ronnybooks.

SO ORDERED this the 12 day of March 2024.



Honorable Paul A. Crotty
UNITED STATES DISTRICT JUDGE

affiliates, predecessors, successors, and assigns (excluding for Macmillan Holdings, its parents, subsidiaries, and affiliates), whether used in commerce in the United States or abroad.